

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
Request for Licensing Freezes and Petition for)	RM-11626
Rulemaking to Amend the Commission's DTV)	
Table of Allocations to Prohibit the Future)	
Licensing of Channel 51 Broadcast Stations and)	
to Promote Voluntary Agreements to Relocate)	
Broadcast Stations from Channel 51)	

COMMENTS OF FRONTIER COMMUNICATIONS

Frontier Communications Corporation (“Frontier”) hereby submits these comments in response to the Federal Communications Commission’s (“Commission”) *Public Notice*¹ seeking comment on the *Petition* referenced above.² Frontier, which operates a telecommunications network across 27 states, is the largest provider of communications services focused on rural America. While Frontier’s business focuses primarily on wireline services, Frontier also has a license to operate in the 700MHz “A Block” in the Rochester, NY area, giving it an interest in this proceeding.

Frontier supports the *Petition*’s request for the Commission to “(1) revise its rules to prohibit future licensing of TV broadcast stations on Channel 51, (2) implement freezes, effective immediately, on the acceptance, processing and grant of applications for new or modified broadcast facilities seeking to operate on Channel 51, and (3) accelerate clearance of Channel 51 where incumbent Channel 51 broadcasters reach voluntary agreements to relocate to

¹ Media Bureau Seeks Comment on Petition for Rulemaking and Request for Licensing Freezes, *Public Notice*, RM-11626, DA 11-562 (rel. Mar. 28, 2011).

² Petition for Rulemaking and Request for Licensing Freezes by CTIA—The Wireless Association and Rural Cellular Association, RM-11626 (filed Mar. 15, 2011) (“*Petition*”).

an alternate channel.”³ Currently there are no Channel 51 operations in the Rochester area, but Frontier is concerned that future Channel 51 operations may impair Frontier’s ability to maximize the spectrum’s utility. Therefore, Frontier supports the *Petition*’s assessment that “[i]n those regions where there is no existing Channel 51 broadcast licensee, adoption of rules eliminating Channel 51 as an option for new broadcasters or those seeking to change channels will provide needed certainty to A Block licensees.”⁴

As the *Petition* notes, “A Block licensees face considerable obstacles to broadband deployment in the 700 MHz band.”⁵ While the *Petition* may have been referring to Channel 51 issues specifically, there are other obstacles that limit A Block licensees’ ability to make use of the spectrum’s broadband potential. For example, A Block licensees face challenges in obtaining end-user devices that are interoperable across the 700 MHz bands. Indeed, the Commission notes that it “has been actively monitoring and encouraging progress in the development of technical specifications and devices for the 700 MHz band, particularly devices that can operate in multiple frequency blocks within the band,” and held a recent workshop to “explor[e] solutions for promoting the development and availability of equipment for the 700 MHz band.”⁶ Numerous participants in the workshop noted that there is no single-chip solution for interoperability across 700 MHz bands at this time, which creates an impediment for A Block

³ *Id.* at 1.

⁴ *Id.* at 10.

⁵ *Id.* at 4.

⁶ Federal Communications Commission to Hold April 26, 2011 Workshop on the Interoperability of Customer Mobile Equipment Across Commercial Spectrum Blocks in the 700 MHz Band, *Public Notice*, RM-11592, DA 11-622 (rel. Apr. 7, 2011).

licensees to provide service because “consumers and smaller carriers that acquired Lower Band 700 MHz Block A spectrum are left without viable and widely useful equipment options.”⁷

The device interoperability issues, combined with the specter of future interference from Channel 51, lead to considerable uncertainty as to the business model for A Block licensees at a time when licensees are due to report their deployment status to the Commission.⁸ The Commission has been made aware of this uncertainty as, according to an *ex parte* filing, the Commission is “encouraging 700 MHz licensees to file reports that include honest and accurate information about the successes and challenges they are experiencing in attempting to meet the FCC’s construction requirements.”⁹ Granting the *Petition* would alleviate potential future interference concerns and allow licensees to construct in their license area with greater certainty as to how they can use spectrum. Accordingly Frontier urges the Commission to quickly adopt the *Petition*’s recommendations for alleviating Channel 51 interference concerns.

Respectfully submitted,

Frontier Communications Corporation

By:

/s/

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⁷ Good Faith Purchasers Alliance, Petition for Rulemaking Regarding the Need for 700 MHz Mobile Equipment to be Capable of Operating on All Paired Commercial 700 MHz Frequency Blocks, RM-11592 (filed Sep. 29, 2009).

⁸ 700 MHz Performance Status Reports Due by June 13, 2011, *Public Notice*, DA 11-563 (rel. Mar. 28, 2011).

⁹ Letter from Rebecca Murphy Thompson, General Counsel, Rural Cellular Association, to Marlene H. Dortch, Secretary, Federal Communications Commission, WT Dkt. No. 06-150 (filed Mar. 8, 2011).